

ROGER P. CROTEAU & ASSOCIATES, LTD.  
 • 2810 West Charleston Blvd, Suite 67 • Las Vegas, Nevada 89102 •  
 Telephone: (702) 254-7775 • Facsimile (702) 228-7719

1 ROGER P. CROTEAU, ESQ.  
 Nevada Bar No. 4958  
 2 TIMOTHY E. RHODA, ESQ.  
 Nevada Bar No. 7878  
 3 ROGER P. CROTEAU & ASSOCIATES, LTD.  
 2810 W. Charleston Blvd., #67  
 4 Las Vegas, Nevada 89102  
 (702) 254-7775 (Telephone)  
 (702) 228-7719 (Facsimile)  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
 6 *Attorney for Plaintiffs*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9  
 10 **DISTRICT OF NEVADA**

11 \*\*\*

12 TAYLOR SOMMER, individually; TAYLOR  
 13 SOMMER, as the Administrator of the ESTATE  
 14 OF REINER SHAWN SOMMER, deceased,

15 Case No.: 2:23-cv-01682-GMN-NJK

16 Plaintiffs,

17  
 18 **STIPULATION TO EXTEND TIME TO**  
 19 **FILE PROPOSED JOINT PRETRIAL**  
 20 **ORDER (SECOND REQUEST)**

21  
 22 CITY OF LAS VEGAS, NEVADA, a political  
 23 subdivision of the State of Nevada; LAS  
 24 VEGAS METROPOLITAN POLICE  
 25 DEPARTMENT, a political subdivision of the  
 26 State of Nevada; JOE LOMARDO, individually  
 27 and as a policy maker and Sheriff of LAS  
 28 VEGAS METROPOLITAN POLICE  
 1 DEPARTMENT; SERGEANT GERALD  
 2 BAGAPORO, individually and in his official  
 3 capacity; SERGEANT JEFFREY BLUM,  
 4 individually and in his official capacity;  
 5 OFFICER ANDREW GARCIA, individually  
 6 and in his official capacity; OFFICER JOSEPH  
 7 ORTEGA, individually and in his official  
 8 capacity; DOE LAS VEGAS METROPOLITAN  
 9 POLICE DEPARTMENT SUPERVISORS I  
 10 through X, inclusive; ROE LAS VEGAS  
 11 METROPOLITAN POLICE DEPARTMENT  
 12 OFFICERS XI through XX, inclusive,

13  
 14 Defendants.

ROGER P. CROTEAU & ASSOCIATES, LTD.  
• 2810 West Charleston Blvd, Suite 67 • Las Vegas, Nevada 89102 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719

1 COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as  
2 the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*,  
3 “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; JOE  
4 LOMBARDO; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER  
5 ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and  
6 through their undersigned counsel of record, and hereby stipulate and agree as follows:  
7

- 8 1. Pursuant to this Court’s Order dated April 22, 2025, the parties hereto were directed to  
9 submit a Joint Pretrial Order (“JPTO”) within 30 days, on or before May 23, 2025.
- 10 2. On May 22, 2025, the parties submitted a stipulation requesting an extension of time until  
11 June 20, 2025, to submit the JPTO. [ECF #47]. Said Stipulation was approved on May 23,  
12 2025. [ECF #48].
- 13 3. The parties continue to draft JPTO but have been unable to complete it to date for various  
14 reasons, including their respective schedules; various other work obligations, including the  
15 appellate briefs mentioned in the prior stipulation; and certain medical appointments on the  
16 part of Plaintiff’s counsel.
- 17 4. Based upon the foregoing, the parties respectfully request an extension of time in which to  
18 submit the JPTO until July 11, 2025.

21 //  
22 //  
23 //  
24 //  
25 //  
26 //  
27 //  
28 //

1           5. This Stipulation is made in good faith and not for purpose of delay.

2           DATED this 23<sup>rd</sup> day of June, 2025.

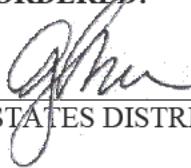
<p>3           <b>ROGER P. CROTEAU &amp; ASSOCIATES, LTD.</b></p> <p>4</p> <p>5           <u>/s/ <i>Timothy E. Rhoda</i></u></p> <p>6           ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 West Charleston Blvd., #67 Las Vegas, Nevada 89102 702-254-7775 <a href="mailto:croteaulaw@croteaulaw.com">croteaulaw@croteaulaw.com</a> Attorney for Plaintiffs</p>	<p>3           <b>MARQUIS &amp; AURBACH</b></p> <p>4</p> <p>5           <u>/s/ <i>Craig R. Anderson</i></u></p> <p>6           CRAIG R. ANDERSON, ESQ. Nevada Bar No. 6882 10001 Park Run Drive Las Vegas, Nevada 89145 702-382-0711 <a href="mailto:canderson@maclaw.com">canderson@maclaw.com</a> Attorney for Defendants</p>
---	---

12

13

14           Dated this 25 day of June, 2025.

15           **IT IS SO ORDERED:**

16             
17           UNITED STATES DISTRICT JUDGE

18

19

20

21

22

23

24

25

26

27

28

ROGER P. CROTEAU & ASSOCIATES, LTD.  
• 2810 West Charleston Blvd, Suite 67 • Las Vegas, Nevada 89102 •  
Telephone: (702) 254-7775 • Facsimile (702) 228-7719